

107485

Solutia Inc.
10300 Olive Boulevard
P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel 314-674-1000

June 10, 1999

Mr. Michael McAteer (SR-6J)
U. S. EPA - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Sauget Area I Site, Sauget and Cahokia, Illinois
U.S. EPA May 29, 1999 response to Solutia's April 8, 1999
Support Sampling Plan submittal

Dear Mr. McAteer,

The U.S. EPA's May 29, 1999 response to Solutia's April 8, 1999 Support Sampling Plan (SSP) submittal was received by Solutia on June 3, 1999. Pursuant to your comment No. 11 on page 3 of the Response (see Attachment A), Solutia does not view the Corps of Engineer's schedule (see Attachment B) as a Final Schedule for performance of the Consent Decree. If we are mistaken on this point, please notify me immediately.

The Corps' schedule is unrealistic and therefore unreasonable for completion of the current EECA / RIFS Scope of Work. The Scope of Work for the EECA / RIFS has increased dramatically from Solutia's original understanding of the project - prior to signing the AOC - and continues to escalate even with the most recent comments. By more than doubling the scope, in combination with July/August as a likely start date for initiation of field work, the Agency's original expectation of completing the EECA / RIFS field work prior to the end of the year is now unrealistic.

The proposed schedule in Solutia's April 8 SSP submittal (see Attachment C) is an aggressive, realistic estimate, based on Solutia's and Solutia's consultants' experience on similar projects. It incorporates the time, which experience has taught, is needed to manage and execute the EECA / RIFS field work in a manner yielding quality results. Contrary to the Corps' proposed project execution logic, Solutia believes that it is neither practical nor cost effective to manage seven collection activities simultaneously at this heavily developed site¹. Some sequencing is necessary for project control. Solutia's proposed schedule also includes the time required to perform quality data management, data validation, data interpretation, human health and ecological risk assessments, and

¹ The seven collection activities include waste, soils, surface water, sediments, groundwater, ecological and air. The site includes over 600 residential and commercial / industrial properties, farming, six suspected source areas, a three mile long surface water body and a thick, highly permeable aquifer.

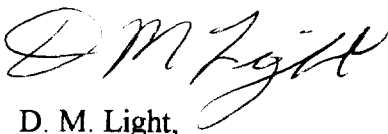
remedial alternatives evaluations. These cannot be adequately performed within the time constraints proposed in your comments.

Of the 26 PRPs issued the Special Notice of Liability in September, 1998, Solutia alone agreed to sign the AOC and has progressively agreed to an EECA / RIFS Scope of Work which has more than doubled since our original discussions. The estimated cost of the current EECA / RIFS has also more than doubled to the \$2.5 - \$3.5 Million range. Nevertheless, Solutia remains willing to undertake the Work included in the April 8th SSP submittal and intends to respond positively to much of the additional scope requested in the Agency's May 29, 1999 comments on the SSP. However, there are multi-tens-of-million dollar decisions that will be made as a result of the work products of the EECA / RIFS. These must be performed properly the first time, with incremental agreements along the way. Solutia cannot properly perform the Work utilizing the Corps' proposed project execution logic and schedule for the field sampling activities, and the other schedule constraints suggested within Comment 11. It is in all of the Stakeholders' best interest for Solutia and U.S. EPA to agree on a realistic implementation schedule and project completion expectation now, rather than expending energies later in non-productive disputes.

Solutia requests that the schedule issue be extracted from the SSP resubmittal due to the Agency by June 25. Solutia further requests the opportunity to meet with you and your managers during the week of June 21 to discuss the EECA / RIFS project implementation schedule. We will at that time propose a more detailed project schedule, explain the project execution logic and give detailed explanations for major time increments.

Thank you for your consideration of this request.

Sincerely,



D. M. Light,
Manager, Remedial Projects

w/attachments

cc:

Mike Foresman - SMC
Joe Nassif, Esq. - Thompson Coburn
Linda Tape, Esq. - Thompson Coburn

Bruce Yare - Solutia
Craig Branchfield - Solutia
Loren Wassell - Solutia

ATTACHMENT A

EPA Comments from EPA's

May 29, 1999 Response to Solutia's

April 8, 1999 SSP Submittal



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 03 1999

REPLY TO THE ATTENTION OF:

May 29, 1999

(SR-6J)

Mr. D. Michael Light
Manager, Remedial Projects
Solutia, Inc.
10300 Olive Boulevard
P.O. Box 66760
St. Louis, Missouri 63166-6760

RE: Comments on April 8, 1999, Revised Support Sampling Plan
Sauget Area 1 Site, Sauget and Cahokia, Illinois

Dear Mr. Light:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed Solutia's April 8, 1999, revised Support Sampling Plan for the Sauget Area 1 Site. While the revised Sampling Plan addresses most of U.S. EPA's earlier comments, particularly relating to the absence of significant sections of the Sampling Plan (i.e., QAPP and Safety Plan), the Sampling Plan is still not approvable. Therefore, U.S. EPA is disapproving your April 8, 1999, revised Sampling Plan. Additional comments from U.S. EPA, including those from the U.S. Army Corps of Engineers, are attached to this letter. No comments were received, nor are any expected, from Illinois EPA. Please revise the Sampling Plan in accordance with the comments and provide U.S. EPA and Illinois EPA with a final plan on or before June 25, 1999.

If you have any questions regarding the attached comments, or if you wish to set up a meeting to go through any of the comments, please call me at 312/886-4663.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael McAteer".

Michael McAteer
Remedial Project Manager

cc: Thomas Martin, USEPA
Candy Morin, Illinois EPA
Tim Gouger, USACE
Kevin de la Bruere, USFWS
Michael Henry, Illinois DNR

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

**COMMENTS ON APRIL 8, 1999, REVISED SUPPORT SAMPLING PLAN
SAUGET AREA 1 SITE**

VOLUME 1A:

1. Solutia's Cover Page, Clarification Request No. 1: All seven steps must be identified in the QAPP. Please see Weston comment on page 2.

2. Solutia's Cover Page, Clarification Request No. 2: Solutia's understanding is correct regarding the fact that U.S. EPA will take the lead on community relations and public participation activities at the Site. Solutia's support and cooperation with Agency-lead community relations activities would be most appreciated.

3. Page 38, Section 5.1.2: Under the discussion for Cerro Copper, in the last sentence there is some information missing from the sentence.

4. Page 40, Section 5.1.2: Under the discussion for Monsanto, there is a general reference made to the manufacture of "various inorganic and organic chemicals." Solutia should be able to provide more detailed information than this. Please include a more detailed listing of the manufacturing processes conducted at the Krummrich plant.

5. Page 51, Section 5.3: If drums are located in the trenches and not removed using an alternate method to confined space entry, then the area where drums are located need to be surveyed into a database so that drum removal activities can possibly be conducted at a later date. For those drums that are removed, please describe in further detail the location, security measures, and time these drums will be stored on-site pending disposal.

6. Page 55, Section 5.6.2: Please note that U.S. EPA does not necessarily agree with Solutia's statement that drum and tank removals can wait until a remedy is implemented. It may be in everyone's best interest to conduct an early source removal action to address groundwater contamination problems *before* a remedy is implemented for the entire site.

7. Page 57, Section 6.2: U.S. EPA agrees that given our general knowledge about groundwater conditions, it would seem unlikely that groundwater flow would be in any direction other than westward toward the Mississippi River. However, it is still worthy of further investigation to fully define the extent of contamination keeping in mind that groundwater flow may be influenced by industrial users and flow reversals as a result of high flows on the Mississippi River.

8. Page 62, Section 6.5.1.3: The reference to the submittal of a report for bedrock groundwater sampling well locations is somewhat confusing. It would seem that decisions on the locations of

bedrock wells could be made in the field after consulting with U.S. EPA. Please explain why the submittal of a report and then waiting for review and acceptance would be more effective.

9. Page 70, Section 7.0: In the third paragraph please describe the timeline for collecting samples from the twenty stations in the developed areas after the sampling results are received from the 45 sampling stations in the undeveloped areas. The same comment applies to Section 7.3.

10. Page 86, Section 11.0: U.S. EPA does not necessarily agree with the statement that Dead Creek could not possibly be a habitat for certain species of fish. This statement needs to be more thoroughly checked in the field.

11. Page 99, Section 16.0 Schedule: A line item schedule must be submitted with the Support Sampling Plan. Please also note that U.S. EPA will not approve Solutia's Support Sampling Plan with a schedule that shows a duration of 390 days for collecting and analyzing soil, sediment, surface water, groundwater and air samples. Nor will U.S. EPA approve Solutia's Support Sampling Plan with a schedule that shows a duration of 210 days for completing the field work for the ecological assessment. These timelines, as presented in the current draft Support Sampling Plan, are unnecessarily long. It appears that Solutia intends to complete the required field work in a sequential timeline instead of conducting the various field activities simultaneously as suggested by U.S. EPA at earlier meetings. U.S. EPA has asked the Army Corps of Engineers to put together a proposed schedule (see attached) for completing the required field investigation work. As you can see, using a concurrent work schedule will substantially expedite this phase of the work. Please evaluate the Corps of Engineers' schedule and re-order your schedule accordingly.

Solutia's proposal to submit a Data Report 100 days after all field work and associated data validation and compilation work is completed is also unacceptable. Once the validation is complete, there is no reason a data report could not be submitted to the Agencies within 30 days. Please keep in mind that the Data Report is only a summation of the data, in table-form, with corresponding figures. There should be little need, if any, for a detailed narrative to accompany this report. Please revise your schedule for the submittal of the Data Report to show 30 days following data validation.

Please also revise the schedule to show that the EE/CA Report is to be submitted 60 days after *submittal* of the Data Report, not 60 days after Agency acceptance. The RI/FS Report is also to be submitted 90 days after submittal of the Data Report, not 90 days after Agency acceptance.

VOLUME 1B:

12. Page 2-3, Figure 2-1: There is a potential exposure pathway for the recreational fisher to come into contact with contaminated surface water and sediments. Please revise the Conceptual Site model and Section 5.3.5.

ATTACHMENT B

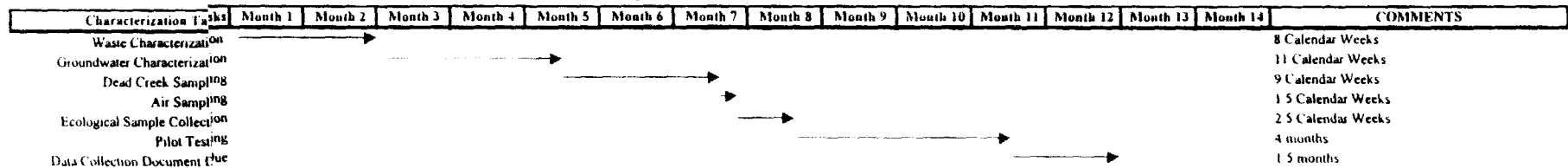
Corps of Engineers schedule from EPA's

May 29, 1999 Response to Solutia's

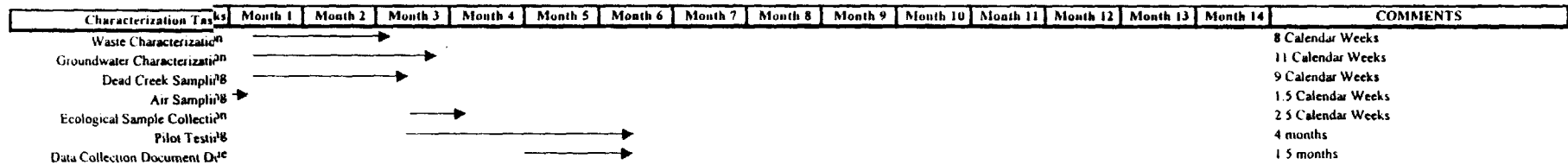
April 8, 1999 SSP Submittal

USACE RAPID RESPONSE
SAUGET AREA 1
ESTIMATED TIMELINE FOR CHARACTERIZATION WORK

SEQUENTIAL WORK ORDER



CONCURRENT WORK ORDER



**USACE RAPID RESPONSE
SAUGET AREA 1
ESTIMATED CHARACTERIZATION SCHEDULE
May 24, 1999**

CHARACTERIZATION TASKS, DESCRIPTION	# SAMPLES	ESTIMATED TIME Work Days
Waste Characterization		
Waste Depth Sampling, G, H, I, L, & N. 4 borings per site to 40 ft	20	5 days
Sediment Samples Site M	4	0.5 day
Well Installation Site G, I 10 Ft TD	NA	0.5 day
Boundary Trenching G,H,I,L,N; 4 trenches per site,	20	3 days
Soil Gas Survey G,H,I,L,N 1 sample\acre	20	10 days
Additional SGS	60	
Electromagnetic Survey G,H,I,L,N 50 x 50 grid	468	15 days
Test Trenches G,H,I,L,N. 1 trench per site	5	5 days
	Waste Characterization Time:	39 Work Days 8 calendar weeks

**USACE RAPID RESPONSE
SAUGET AREA 1
ESTIMATED CHARACTERIZATION SCHEDULE
May 24, 1999**

CHARACTERIZATION TASKS, DESCRIPTION	# SAMPLES	ESTIMATED TIME Work Days
Dead Creek Sampling		
Transects (7)		
Soil Sampling undeveloped areas 1 sample\200 ft Surface, subsurface samples	90	5 days (20 samples/day)
3 samples closest to highest [] along transects	3	0.5 day
Soil Sampling, developed areas. Surface, subsurface samples	40	2 days (20 samples/day)
2 samples closest to highest [] along transects	2	0.5 day
Background Soil Samples EE-20, EE-04, EEG-108, 3 depths	6	1 day
Leachate Sampling Site I, G	2	1 day
Dead Creek Sediment Sampling		
Undeveloped Areas, 1 sample\200 ft	50 (150)	15 days (10 sediment samples/day)
Developed Areas, 1 sample\150 ft	47 (141)	14 days
Borrow Pit Lake	8	2 days
TAL\TCL sampling every 1000 ft	20	Take samples when developed, undeveloped areas are sampled
Surface Water Sampling		
Dead Creek, 1 sample\1000ft	20 for all descriptors	5 days
CS-F		
Old Prairie du Pont (upstream & downstream)		
	Waste Characterization Time:	46 days 9 calendar weeks

ATTACHMENT C

Solutia's Schedule in the
April 8, 1999 SSP Submittal

16.0 Schedule

A significant milestone project schedule is given below:

Line Item Project Schedule

Submit	10 days after Agency acceptance of the SSP and associated FSP, QAPP and HASP documents.
---------------	--

Soil, Sediment, Surface Water, Alluvial Aquifer Groundwater and Air Sample Collection, Analysis, Data Validation and Data Compilation

Start	30 days after Agency Acceptance of the SSP and the Soil, Sediment, Surface Water, Groundwater and Air FSP, QAPP and HASP
Completion	390 days after start

Ecological Sample Collection, Analysis, Data Validation and Data Compilation

Start	30 days after Agency acceptance of the SSP and the Ecological Sampling FSP, QAPP and HASP and the proposed Ecological Reference Area
Completion	210 days after start

Preparation of Support Sampling Plan Data Report

Start	10 days after completion of the Soil, Sediment, Surface Water, Groundwater and Air Sample Collection, Analysis, Data Validation and Data Compilation, Bedrock Groundwater Sample Collection and Ecological Sample Collection, Analysis, Data Validation and Data Compilation
Completion	100 days After Start

Preparation of EE/CA Report

Start	10 days after Agency acceptance of the Support Sampling Plan Data Report
Completion	60 days after start

Preparation of RI/FS Report

Start	10 days after Agency acceptance of the Support Sampling Plan Data Report
Completion	90 days after start

**USACE RAPID RESPONSE
SAUGET AREA 1
ESTIMATED CHARACTERIZATION SCHEDULE
May 24, 1999**

CHARACTERIZATION TASKS, DESCRIPTION	# SAMPLES	ESTIMATED TIME Work Days
Air Sampling 7 day period		
VOC T01	13	8 days
SemiVOC, PCB, DIOXIN	13	
METALS	13	
Ecological Sample Collection Section 11		10 days
	Waste Characterization Time:	18 days 4 calendar weeks
Pilot Treatability Tests		
Off-site Waste Incineration		3 months to coordinate, execute pilot tests and evaluate results.
On-site Waste Thermal Desorption		
On-Site Sediment Thermal Desorption		
Sediment Stabilization		
Leachate Treatment		
	Pilot Testing Time:	3 months